

SAMUEL BERNARD JOHNSON III  
4420 Abruzzi Circle  
Stockton, California 95206  
(209) 982-5904 - Telephone  
[blakviii@aol.com](mailto:blakviii@aol.com) - Email

**Plaintiff - *In Pro Se***

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

SAMUEL BERNARD JOHNSON III,  
Plaintiff,  
vs.  
CHEVRON CORPORATION, a Delaware  
corporation, CHEVRON ENVIRONMENTAL  
MANAGEMENT COMPANY, a California  
corporation, and DOES 1-10,

## Defendants

Case No.: C 07-05756 SI (JCS)

**NOTICE OF MOTION OF PLAINTIFF'S  
MOTION TO COMPEL DISCOVERY  
FROM DEFENDANTS CHEVRON  
CORPORATION, CHEVRON  
ENVIRONMENTAL MANAGEMENT  
COMPANY, THEIR ATTORNEY  
OF RECORD AND REQUEST FOR  
SANCTIONS**

**DATE:** Friday, September 12, 2008

**TIME:** 9:30 a.m.

## **COURTROOM: A, 15<sup>th</sup> Floor**

**JUDGE:** Hon. Magistrate Joseph C. Spero

1           **TO DEFENDANTS CHEVRON CORPORATION, CHEVRON**  
2           **ENVIRONMENTAL MANAGEMENT COMPANY AND THEIR ATTORNEY OF**  
3           **RECORD:**

4           **PLEASE TAKE NOTICE** that on Friday, September 12, 2008, at 9:30 a.m. or as soon  
5 thereafter as the matter may be heard, before the Honorable Magistrate Judge Joseph C. Spero,  
6 located at the United States District Court, Northern District of California, San Francisco  
7 Division, 450 Golden Gate Avenue, Courtroom A, 15<sup>th</sup> Floor, San Francisco, California 94102,  
8 Samuel Bernard Johnson III (hereinafter referred to as "Plaintiff Johnson") will and hereby do  
9 move for an order granting Plaintiff Johnson's Motion to Compel Discovery and Request for  
10 Sanctions in this action.

11           Plaintiff Johnson makes this Motion to Compel Discovery and Request for Sanctions  
12 pursuant to pursuant to Federal Rule of Civil Procedure 37 and Civil Local Rules 7, 7-6 and 7-8,  
13 on the grounds that Delia A. Isvoranu, Esq. of Filice Brown and Eassa LLP, (hereinafter referred  
14 to as "Counsel for Chevron") and Defendants Chevron Corporation and Chevron Environmental  
15 Management Company, (hereinafter referred to as the "Chevron Defendants" have withheld  
16 relevant discovery that will lead to admissible evidence as well as will assist Plaintiff Johnson in  
17 calculating damages in this action. Plaintiff Johnson further contends that the withheld discovery  
18 is needed in order to take several employees depositions as well as 30(b) depositions.

19           Plaintiff Johnson's motion is based on this Notice of Motion to Compel Discovery and  
20 Request for Sanctions, the Memorandum of Points and Authorities In Support of Plaintiff's  
21 Motion to Compel Discovery and Request for Sanctions, the Declaration of Samuel Bernard  
22 Johnson III In Support of Plaintiff's Motion to Compel Discovery and Request for Sanctions, the  
23 pleadings and records on file herein, and such additional materials and arguments as may be  
24 presented to the Court at or before the hearing on the Motion.

25           By way of this Notice of Motion to Compel Discovery and Request for Sanctions, ,  
26 Plaintiff Johnson further respectfully requests that no oral arguments be conducted on this  
27  
28

1 pleading and any other pleadings that may be filed with the Court pertaining to this subject  
2 matter. Such is requested pursuant to Civil Local Rule 7-6.

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5 Dated this 4<sup>th</sup> day of August 2008

/s/

6 SAMUEL BERNARD JOHNSON III  
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